

**COLORADO DISCHARGE PERMIT SYSTEM (CDPS)  
FACT SHEET FOR PERMIT NUMBER CO0031755  
PAGOSA AREA WATER AND SANITATION DISTRICT VISTA WASTEWATER  
TREATMENT PLANT, ARCHULETA COUNTY**

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**I. TYPE OF PERMIT**

- A. Permit Type:** Domestic- Major Municipal, Mechanical Plant, Third  
Renewal
- B. Discharge To:** Surface Water

**II. FACILITY INFORMATION**

- A. SIC Code:** 4952 Sewerage Systems
- B. Facility Classification:** Class B per Section 100.5.2 of the Water and Wastewater  
Facility Operator Certification Requirements
- C. Facility Location:** NW 1/4 of the SW 1/4 of S36, T36N, R2 1/2 W, N.M.P.M.;  
100 Lyn Ave in Pagosa Springs, CO; at 37 15' 21" latitude  
N and 107 06' 13" longitude W
- D. Permitted Feature:** 001A, following UV disinfection and prior to entering  
Stevens Draw 37°15' 21" N, 107° 06' 13" W
- The location(s) provided above will serve as the point(s) of  
compliance for this permit and are appropriate as they are  
located after all treatment and prior to discharge to the  
receiving water.
- E. Facility Flows:** 3.75 MGD January-March; 3.9 MGD April-December

#### **F. Major Changes From Last Renewal:**

A change since the last renewal includes the elimination of the Highlands Lagoon WWTF (Permit # CO00589080) and consolidation of its influent with the Vista WWTP influent, which is accomplished by the new Mockingbird lift station. Facility improvements to the Vista WWTP include the addition of a backup centrifuge and a solar sludge drying greenhouse.

Other changes from the previous permit are as follows: more stringent sublethal WET testing limits; reporting mercury data at a low level detection limit; *E. coli* testing in place of fecal coliform testing; a limit for potentially dissolved copper; and a monitoring requirement for nonylphenol. Compliance schedules have been included for *E. coli*, potentially dissolved copper, and nonylphenol.

### **III. RECEIVING STREAM**

#### **A. Waterbody Identification:**

*COSJPI06a, Stevens Draw, tributary to Martinez Creek and then Stollsteimer Creek*

#### **B. Water Quality Assessment:**

An assessment of the stream standards, low flow data, and ambient stream data has been performed to determine the assimilative capacities for *Stevens Draw, tributary to Martinez Creek and then Stollsteimer Creek* for potential pollutants of concern. This information, which is contained in the Water Quality Assessment (WQA) for this receiving stream(s), also includes an antidegradation review, where appropriate. The Division's Permits Section has reviewed the assimilative capacities to determine the appropriate water quality-based effluent limitations as well as potential limits based on the antidegradation evaluation, where applicable. The limitations based on the assessment and other evaluations conducted as part of this fact sheet can be found in Part I.A of the permit.

001A will continue to be the authorized discharge point to the receiving stream.

### **IV. FACILITY DESCRIPTION**

#### **A. Infiltration/Inflow (I/I)**

No infiltration/inflow problems have been documented in the service area.

#### **B. Lift Stations**

Table IV-1 summarizes the information provided in the renewal application for the lift stations in the service area.

**Table IV-1 – Lift Station Summary**

<b>Station Name/#</b>	<b>Firm Pump Capacity (gpm)</b>	<b>Peak Flows (gpd)*</b>	<b>% Capacity (based on peak flow)</b>
1	2 pumps- 60 hp, 610 gpm ea.	50,000	3
3	2 pumps- 34 hp, 1319 gpm ea.	500,000	13
4	2 pumps- 5 hp, 350 gpm ea.	9,420	1
5	2 pumps- 24 hp, 1100 gpm ea.	416,520	13

6	2 pumps- 20 hp, 1000 gpm ea.	168,000	6
7	2 pumps- 5 hp, 400 gpm ea.	80,000	7
8	2 pumps- 5 hp, 200 gpm ea.	7,140	1
9	2 pumps-10 hp, 190 gpm ea.	1,000	1
11	2 pumps-15 hp, 180 gpm ea.	23,280	4
12	2 pumps- 2 hp, 75 gpm ea.	5,000	2
13	2 pumps- 5 hp, 300 gpm ea.	23,040	7
14	2 pumps- 5 hp, 200 gpm ea.	15,360	7
15	2 pumps-2.4 hp, 100 gpm ea.	22,200	8
16	2 pumps- 3 hp, 150 gpm ea.	25,620	6
17	2 pumps- 15 hp, 80 gpm ea.	13,000	6
18	2 pumps- 50 hp, 100 gpm ea.	6,360	2
20	2 pumps- 1 hp (E-1 brand), 15 gpm ea.	200	1
21	2 pumps-5 hp, 150 gpm ea.	43,200	10
22	2 pumps- 2.4 hp, 60 gpm ea.	6,000	3
23	2 pumps- 3 hp, 100 gpm ea.	3,900	1
24	2 pumps-7.5 hp, 200 gpm ea.	10,000	2
27	2 pumps- 10 hp, 800 gpm ea.	Intermittent use	N/A
28	2 pumps- 1 hp (E-1 brand), 15 gpm ea.	200	1
29	2 pumps-1 hp (E-1 brand), 15 gpm ea.	200	1
Mockingbird	2 pumps- 50 hp, 400 gpm ea.	50,000	2
	1 pump- 150 hp, 1000 gpm ea.		

### C. Chemical Usage

The permittee did not specify any chemicals for use in waters that may be discharged. On this basis, no chemicals are approved under this permit. Prior to use of any applicable chemical, the permittee must submit a request for approval that includes the most current Material Safety Data Sheet (MSDS) for that chemical. Until approved, use of any chemical in waters that may be discharged could result in a discharge of pollutants not authorized under the permit. Also see Part II.A.1. of the permit.

### D. Treatment Facility, Facility Modifications and Capacities

The Pagosa Area Water and Sanitation District's Vista WWTP is comprised of aeration basins and final clarification, with expansion and rehabilitation upgrades to the facility completed in 2004. An in-ground digester and solar activated thermal sludge drying facility was constructed in 2012. Biosolids are currently being stored in the thermal drying facility waiting testing and disposition. The process flow is as follows: wastewater enters a headworks building and screened with a Heuber mechanical bar screen, influent flow monitoring via a 2-foot square weir with ultrasonic recorder, and grit removal and washing equipment; following the headworks are two aeration basins operated in parallel and equipped with Sanitaire fine perforated membrane diffusers and three final clarifiers. Disinfection is accomplished via Wedeco Ultraviolet equipment prior to final flow measurement, which is accomplished by means of a 2.5-foot square weir with an ultrasonic recorder prior to discharge to Stephens Draw.

The permittee has not performed any construction at this facility that would change the hydraulic capacity of 3.75 MGD (January through March) and 3.9 MGD (April through December) or the organic capacity of 3756 lbs BOD<sub>5</sub>/day (January through March) and 3906 lbs BOD<sub>5</sub>/day (April through December), which were specified in the Site Approval (#4614). The Site Approval document should be referred to for design information. These capacities will continue in this permit.

## E. Biosolids Treatment and Disposal

Biosolids are currently being stored at the facility campus for drying purposes in the new solar sludge drying greenhouse. To date, Vista WWTP has not completed the first batch of sludge and therefore is uncertain how long completion will take or what PAWSD will do with the dried sludge once it is completed. The ultimate plan has always been to bag the finished product and give away to the public as a Class A finished product.

### 1. EPA General Permit

EPA Region 8 issued a General Permit (effective October 19, 2007) for Colorado facilities whose operations generate, treat, and/or use/dispose of sewage sludge by means of land application, landfill, and surface disposal under the National Pollutant Discharge Elimination System. All Colorado facilities are required to apply for and to obtain coverage under the EPA General Permit.

### 2. Biosolids Regulation (Regulation No. 64, Colorado Water Quality Control Commission)

While the EPA is now the issuing agency for biosolids permits, Colorado facilities that land apply biosolids must comply with requirements of Regulation No. 64, such as the submission of annual reports as discussed later in this rationale.

## V. PERFORMANCE HISTORY

### A. Monitoring Data

1. Discharge Monitoring Reports – The following table summarize the effluent data reported on the Discharge Monitoring Reports (DMRs) for the previous permit term, from January 2007 through July 2012.

**Table V-1 – Summary of DMR Data for Permitted Feature 001A**

<i>Parameter</i>	<i># Samples or Reporting Periods</i>	<i>Reported Average Concentrations Avg/Min/Max</i>	<i>Reported Maximum Concentrations Avg/Min/Max</i>	<i>Previous Avg/Max/AD Permit Limit</i>	<i>Number of Limit Excursion s</i>
<i>Effluent Flow (MGD)</i>	67	0.73/0.38/2.3	1.1/0.46/9.3	3.9	0
<i>pH (su)</i>	67	6.9/6.2/7.4	7.8/7.1/8.8	6.5 - 9	1
<i>Fecal Coliform (#/100 ml)</i>	67	6.6/1/377	22/1/580	325/650	1
<i>NH3 as N, Tot (mg/l) Jan</i>	6	0.74/0.04/1.8	1.7/0.07/4.7	5/14	0
<i>NH3 as N, Tot (mg/l) Feb</i>	6	1/0.06/2.9	1.7/0.09/5.6	4.1/12	0
<i>NH3 as N, Tot (mg/l) Mar</i>	6	1.3/0.08/4.4	1.9/0.1/5.5	4.4/13	0
<i>NH3 as N, Tot (mg/l) Apr</i>	6	0.98/0.1/3.6	1.9/0.17/4.5	3.9/13	0
<i>NH3 as N, Tot (mg/l) May</i>	6	2/0.03/5	4.1/0.04/9.3	3.3/12	1
<i>NH3 as N, Tot (mg/l) Jun</i>	6	2/0.03/5	4.2/0.11/18	3.4/14	1
<i>NH3 as N, Tot (mg/l) Jul</i>	6	1.4/0.76/2.5	2.9/1.5/7	3/15	0
<i>NH3 as N, Tot (mg/l) Aug</i>	5	0.85/0.23/1.9	1.4/0.63/2.6	2.2/12	0
<i>NH3 as N, Tot (mg/l) Sep</i>	5	0.94/0.11/2.2	1.6/0.27/2.6	2.6/13	0

NH <sub>3</sub> as N, Tot (mg/l) Oct	5	1.1/0.09/2.3	2.5/0.13/5.3	2.5/11	0
NH <sub>3</sub> as N, Tot (mg/l) Nov	5	1/0.06/1.4	0.85/0.06/1.4	3.8/13	0
NH <sub>3</sub> as N, Tot (mg/l) Dec	5	0.81/0.1/1.5	1.7/0.19/3.7	4/12	0
BOD <sub>5</sub> , effluent (mg/l)	67	4.4/1.3/8.2	6.7/2.1/27	30/45	0
BOD <sub>5</sub> (% removal)	67	98/95/99	NA/NA/NA	85 (min)	0
TSS, effluent (mg/l)	67	5.1/2.2/18	8/2.8/34	30/45	0
TSS (% removal)	67	97/89/99	NA/NA/NA	85 (min)	0
Oil and Grease (mg/l)	67	NA/NA/NA	0/0/0	NA/10	0
TDS (mg/l)	65	375/82/521	375/82/521	Report/Report	0
PWS intake (mg/l)	67	122/67/409	122/67/409	Report/Report	0
As, TR (µg/l)	64	0.94/0/5	0.94/0/5	Report/Report	0
Cd, Dis (µg/l)	65	0.061/<0.05/0.78	0.061/<0.05/0.78	Report/Report	0
Cr+3, TR (µg/l)	67	4/0.05/10	4/0.05/10	Report/Report	0
Cr+6, Dis (µg/l)	67	2.9/<8/22	2.9/<8/22	Report/Report	0
Cu, Dis (µg/l)	67	9.2/0.022/38	9.2/0.022/38	Report/Report	0
CN, Free (µg/l)	66	38/0/2240	72/0/4480	Report/Report	0
Fe, TR (µg/l)	67	87/0.29/430	87/0.29/430	Report/Report	0
Pb, Dis (µg/l)	67	1.2/0/7.7	1.2/0/7.7	Report/Report	0
Mn, Dis (µg/l)	67	63/0.064/185	63/0.064/185	Report/Report	0
Hg, Tot (µg/l)	21	0.18/0/0.3	0.18/0/0.3	Report/Report	0
Ni, Dis (µg/l)	67	3.8/0.0034/8	3.8/0.0034/8	Report/Report	0
Se, Dis (µg/l)	67	1.4/<1/5	1.4/<1/5	Report/Report	0
Ag, Dis (µg/l)	67	0.0094/<0.1/0.18	0.0094/<0.1/0.18	Report/Report	0
Zn, Dis (µg/l)	67	53/0.091/303	53/0.091/303	Report/Report	0
WET, chronic					0
pimephales lethality, Stat Diff	21	//	100/100/100	Statistical Difference or IC25 > IWC	0
ceriodaphnia lethality, Stat Diff	21	//	100/100/100	Statistical Difference or IC25 > IWC	0
*The pH data shows the minimum reported values in the "average" column, and the maximum reported values in the "maximum column"					

## B. Compliance With Terms and Conditions of Previous Permit

1. Effluent Limitations –The data shown in the preceding table indicate apparent violations of the permit.

An extremely high value for cyanide (weak acid, dissociable) existed on 11/30/2008. Since this date, cyanide levels have been very low (almost all values are <5 ug/l). This value is so high that the Division believes it is an error.

2. In April 2010, a minimum pH of 6.2 was recorded. Because this value is outside the allowed range, it has been counted as an excursion of the limit and is not eligible for a monitoring reduction.

3. In September 2007, a fecal coliform value of 377 colonies/100 ml was recorded. Because this value is greater than the allowable limit (325 colonies/100 ml), this instance has been counted as an excursion. However, this permit requires the permittee to monitor *E. coli* rather than fecal coliform and thus no further mention of

this particular excursion is made.

4. A few instances occurred in which ammonia levels exceeded the permit limits. Because of these excursions, and because this facility treats specifically for this parameter, no monitoring reduction will be given.

In accordance with 40 CFR Part 122.41(a), any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

## **VI. DISCUSSION OF EFFLUENT LIMITATIONS**

### **A. Regulatory Basis for Limitations**

#### **1. Technology Based Limitations**

- a. Federal Effluent Limitation Guidelines – The Federal Effluent Limitation Guidelines for domestic wastewater treatment facilities are the secondary treatment standards. These standards have been adopted into, and are applied out of, Regulation 62, the Regulations for Effluent Limitations.
- b. Regulation 62: Regulations for Effluent Limitations – These Regulations include effluent limitations that apply to all discharges of wastewater to State waters and are shown in Section VIII of the WQA. These regulations are applicable to the discharge from the Pagosa Area Water and Sanitation District WWTP.

2. Numeric Water Quality Standards - The WQA contains the evaluation of pollutants limited by water quality standards. The mass balance equation shown in Section VI of the WQA was used for most pollutants to calculate the potential water quality based effluent limitations (WQBELs),  $M_2$ , that could be discharged without causing the water quality standard to be violated. For ammonia, the AMMTOX Model was used to determine the maximum assimilative capacity of the receiving stream. A detailed discussion of the calculations for the maximum allowable concentrations for the relevant parameters of concern is provided in Section V of the Water Quality Assessment developed for this permitting action.

The maximum allowable effluent pollutant concentrations determined as part of these calculations represent the calculated effluent limits that would be protective of water quality. These are also known as the water quality-based effluent limits (WQBELs). Both acute and chronic WQBELs may be calculated based on acute and chronic standards, and these may be applied as daily maximum (acute) or 30-day average (chronic) limits.

3. Narrative Water Quality Standards - Section 31.11(1)(a)(iv) of The Basic Standards and Methodologies for Surface Waters (Regulation No. 31) includes the narrative standard that State surface waters shall be free of substances that are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life.

- a. Whole Effluent Toxicity - The Water Quality Control Division has established the use of WET testing as a method for identifying and controlling toxic discharges from wastewater treatment facilities. WET testing is being utilized as a means to ensure that there are no discharges of pollutants "in amounts, concentrations or combinations which are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life" as required by Section 31.11 (1) of the Basic Standards and Methodologies for Surface Waters. The requirements for WET testing are being implemented in accordance with Division policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010). Note that this policy has recently been updated and the permittee should refer to this document for additional information regarding WET.
4. Water Quality Regulations, Policies, and Guidance Documents
  - a. Antidegradation - Since the receiving water is Use Protected an antidegradation review is not required pursuant to Section 31.8(2)(b) of The Basic Standards and Methodologies for Surface Water.
  - b. Antibacksliding – As the receiving water is designated Use-Protected, the antibacksliding requirements in Regulation 61.10 have been met.
  - c. Determination of Total Maximum Daily Loads (TMDLs) – This stream segment is not on the State's 303(d) list, and therefore TMDLs do not apply.
  - d. Colorado Mixing Zone Regulations – Pursuant to section 31.10 of The Basic Standards and Methodologies for Surface Water, a mixing zone determination is required for this permitting action. The Colorado Mixing Zone Implementation Guidance, dated April 2002, identifies the process for determining the meaningful limit on the area impacted by a discharge to surface water where standards may be exceeded (i.e., regulatory mixing zone). This guidance document provides for certain exclusions from further analysis under the regulation, based on site-specific conditions.

The guidance document provides a mandatory, stepwise decision-making process for determining if the permit limits will not be affected by this regulation. Exclusion, based on Extreme Mixing Ratios, may be granted if the ratio of the facility design flow to the chronic low flow (30E3) is greater than 2:1 Since the ratio of the chronic low flow to the design flow is 0:1 permittee is eligible for an exclusion from further analysis under the regulation.
  - f. Salinity Regulations – In compliance with the Colorado River Salinity Standards and the Colorado Discharge Permit System Regulations, the permittee shall monitor for total dissolved solids on a monthly basis. Samples shall be taken at Permitted Feature 001A.

An evaluation of the discharge of total dissolved solids indicates that the Pagosa Area Water and Sanitation District facility exceeds the threshold of 1 ton/day or 366 tons/year of salinity. To determine the TDS loading from this facility, the

average reported TDS values (mg/l) were multiplied by the average flow (mgd), then by 8.34 (conversion factor). The average was determined to be 1.1 tons/day.

However, the average concentration discharged is less than an incremental increase of 400 mg/l over the raw water supply and therefore the facility is exempt from further requirements other than monitoring for TDS (Reg. 61.8(20)(L)(iv)).

- g. Reasonable Potential Analysis – Using the assimilative capacities contained in the WQA, an analysis must be performed to determine whether to include the calculated assimilative capacities as QBELs in the permit. This reasonable potential (RP) analysis is based on the Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, dated December, 2002. This guidance document utilizes both quantitative and qualitative approaches to establish RP depending on the amount of available data.

A qualitative determination of RP may be made where ancillary and/or additional treatment technologies are employed to reduce the concentrations of certain pollutants. Because it may be anticipated that the limits for a parameter could not be met without treatment, and the treatment is not coincidental to the movement of water through the facility, limits may be included to assure that treatment is maintained.

A qualitative RP determination may also be made where a federal ELG exists for a parameter, and where the results of a quantitative analysis results in no RP. As the federal ELG is typically less stringent than a limitation based on the QBELs, if the discharge was to contain concentrations at the ELG (above the QBEL), the discharge may cause or contribute to an exceedance of a water quality standard.

To conduct a quantitative RP analysis, a minimum of 10 effluent data points from the previous 5 years, should be used. The equations set out in the guidance for normal and lognormal distribution, where applicable, are used to calculate the maximum estimated pollutant concentration (MEPC). For data sets with non-detect values, and where at least 30% of the data set was greater than the detection level, MDLWIN software is used consistent with Division guidance to generate the mean and standard deviation, which are then used to establish the multipliers used to calculate the MEPC. If the MDLWIN program cannot be used the Division's guidance prescribes the use of best professional judgment.

For some parameters, recent effluent data or an appropriate number of data points may not be available, or collected data may be in the wrong form (dissolved vs total) and therefore may not be available for use in conducting an RP analysis. Thus, consistent with Division procedures, monitoring will be required to collect samples to support a RP analysis and subsequent decisions for a numeric limit. A compliance schedule may be added to the permit to require the request of an RP analysis once the appropriate data have been collected.



For other parameters, effluent data may be available to conduct a quantitative analysis, and therefore an RP analysis will be conducted to determine if there is RP for the effluent discharge to cause or contribute to exceedances of ambient water quality standards. The guidance specifies that if the MEPC exceeds the maximum allowable pollutant concentration (MAPC), limits must be established and where the MEPC is greater than half the MAPC (but less than the MAPC), monitoring must be established. Table VI-1 contains the calculated MEPC compared to the corresponding MAPC, and the results of the reasonable potential evaluation, for those parameters that met the data requirements. The RP determination is discussed for each parameter in the text below.

**Table VI-1 – Reasonable Potential Analysis**

Parameter	30-Day Average			7-Day Ave or Daily Max		
	MEPC	WQBEL (MAPC)	Reasonable Potential	MEPC	WQBEL (MAPC)	Reasonable Potential
<i>E. coli</i> (#/100 ml)	NA	205	Yes (Qual)	NA	410	Yes (Qual)
NH3 as N, Tot (mg/l) Jan	1.8	6.5	Yes (Qual)	4.7	30	Yes (Qual)
NH3 as N, Tot (mg/l) Feb	2.9	6.1	Yes (Qual)	5.6	28	Yes (Qual)
NH3 as N, Tot (mg/l) Mar	4.4	4.7	Yes (Qual)	5.5	20	Yes (Qual)
NH3 as N, Tot (mg/l) Apr	3.6	4.7	Yes (Qual)	4.5	22	Yes (Qual)
NH3 as N, Tot (mg/l) May	5	4.1	Yes (Qual)	9.3	24	Yes (Qual)
NH3 as N, Tot (mg/l) Jun	5	3.6	Yes (Qual)	18	23	Yes (Qual)
NH3 as N, Tot (mg/l) Jul	2.5	3	Yes (Qual)	7	22	Yes (Qual)
NH3 as N, Tot (mg/l) Aug	1.9	3.2	Yes (Qual)	2.6	25	Yes (Qual)
NH3 as N, Tot (mg/l) Sep	2.2	3.5	Yes (Qual)	2.6	26	Yes (Qual)
NH3 as N, Tot (mg/l) Oct	2.3	3.4	Yes (Qual)	5.3	19	Yes (Qual)
NH3 as N, Tot (mg/l) Nov	1.4	5.2	Yes (Qual)	1.4	29	Yes (Qual)
NH3 as N, Tot (mg/l) Dec	1.5	6.4	Yes (Qual)	3.7	28	Yes (Qual)
As, TR (µg/l)	11	10	No (Qual)			
Cd, Dis (µg/l)	2.1	1.2	No (Qual)	2.1	9.1	No
Cr+3, TR (µg/l)				21	50	No
Cr+6, Dis (µg/l)	20	11	No (Qual)	20	16	No (Qual)
Cu, Dis (µg/l)	77	29	Yes	77	50	Yes
CN, Free (µg/l)				6012*	5	No (Qual)
Fe, TR (µg/l)	746	1000	Monitor			
Pb, Dis (µg/l)	17	11	No (Qual)	17	281	No
Mn, Dis (µg/l)	302	2618	No	302	4738	No
Mo, TR (µg/l)	5	160	No (Qual)			
Hg, Tot (µg/l)	0.36	0.01	Yes			
Ni, Dis (µg/l)	11	168	No	11	1513	No
Se, Dis (µg/l)	8.1	4.6	Monitor	8.1	18	No
Ag, Dis (µg/l)	0.58	3.5	No	0.58	22	No
Zn, Dis (µg/l)	340	405	Monitor	340	467	Monitor
Nonylphenol (µg/l)	NA	7	Monitor	NA	28	Monitor

\* Although this indicates that there should be RP, it is based off of a value of 4480 mg/l, that is most likely a lab or transposing error. With this value (11/2008) omitted, the remaining data was all <5 mg/l, and therefore a no RP determination has been made.

## **B. Parameter Evaluation**

BOD<sub>5</sub> - The BOD<sub>5</sub> concentrations in Reg. 62 are the most stringent effluent limits and are therefore applied. The removal percentages for BOD<sub>5</sub> also apply based on the Regulations for Effluent Limitations. This limitation is the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Total Suspended Solids - The TSS concentrations in Reg. 62 are the most stringent effluent limits and are therefore applied. The removal percentages for TSS also apply based on the Regulations for Effluent Limitations. This limitation is the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Oil and Grease - The oil and grease limitations from the Regulations for Effluent Limitations are applied as they are the most stringent limitations. This limitation is the same as those contained in the previous permit and is imposed upon the effective date of this permit.

pH - This parameter is limited by the water quality standards of 6.5-9.0 s.u., as this range is more stringent than other applicable standards. This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

E. coli - There were no data available for *E. coli*, as similar pathogens were detected through a fecal coliform test. Upon the effective date of this permit, the permittee is required to monitor *E. coli* rather than fecal coliform. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for this parameter. A report only requirement has been added to the permit upon the effective date of this permit until 12/31/2013. Beginning on 01/01/2014, the *E. coli* limit will take effect.

Ammonia - The limitation for ammonia is based upon the WQBEL as described in the WQA. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for this parameter. Previous monitoring, as shown in Table V-1, indicate that this limitation can be met and is therefore effective immediately.

Total Arsenic - The RP analysis for total recoverable arsenic was based upon the WQBEL as described in the WQA. With the available data, the MDLWIN program was used to determine the appropriate statistics to determine the MEPC. Although the quantitative RP results in a limit, in looking at the data, the vast majority of values are <2.5 µg/l, which is significantly lower than the potential limit of 10 µg/l. A qualitative determination of no RP has been given for this parameter, resulting in no limit nor monitoring requirement.

Potentially Dissolved Cadmium - The RP analysis for potentially dissolved cadmium was based upon the WQBEL as described in the WQA. With the available data, the MDLWIN program was used to determine the appropriate statistics to determine the MEPC. Although the quantitative RP results in a limit, in looking at the data, the vast majority of values are ≤0.1 µg/l, which is significantly lower than the potential limit of 1.2 µg/l. A qualitative determination of no RP has been given for this parameter, resulting in no limit nor monitoring requirement.

Total Recoverable Trivalent Chromium – The RP analysis for total recoverable trivalent chromium was based upon the WQBEL as calculated in the WQA. With the available data the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC and therefore limitations are not necessary at this time.

Dissolved Hexavalent Chromium – The RP analysis for dissolved hexavalent chromium was based upon the WQBEL as described in the WQA. With the available data, the MDLWIN program was used to determine the appropriate statistics to determine the MEPC. Although the quantitative RP results in a limit, in looking at the data, all of the values in the last three years are  $\leq 8 \mu\text{g/l}$ , which is lower than the potential limit of  $11 \mu\text{g/l}$ . A qualitative determination of no RP has been given for this parameter, resulting in no limit nor monitoring requirement.

Potentially Dissolved Copper – The RP analysis for potentially dissolved copper was based upon the WQBEL as described in the WQA. With the available data, the normal program was used to determine the appropriate statistics to determine the MEPC. The chronic MEPC was greater than the chronic MAPC and therefore a 30-day maximum requirement has been added to the permit. Based upon previous monitoring, the permittee may not be able to consistently meet this limitation and a compliance schedule has been added to the permit to give the permittee time to meet this limitation.

Cyanide- The RP analysis for cyanide was based upon the WQBEL as described in the WQA. A qualitative RP results in a no RP determination as the last 4 years of data are less than  $5 \text{ mg/l}$ .

Total Recoverable Iron- The RP analysis for total recoverable iron was based upon the WQBEL as described in the WQA. With the available data, the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than the MAPC and therefore limitations are not necessary at this time; however, the MEPC was greater than 50% of the MAPC and monitoring is required. A report only requirement has been added to the permit, effective immediately.

Potentially Dissolved Lead- The RP analysis for potentially dissolved lead was based upon the WQBEL as described in the WQA. With the available data, the MDLWIN program was used to determine the appropriate statistics to determine the MEPC. Although the quantitative RP results in a limit, in looking at the data, the vast majority of values are  $<2.5 \mu\text{g/l}$ , which is significantly lower than the potential limit of  $11 \mu\text{g/l}$ . A qualitative determination of no RP has been given for this parameter, resulting in no limit nor monitoring requirement.

Potentially Dissolved Manganese- The RP analysis for potentially dissolved manganese was based upon the WQBEL as calculated in the WQA. With the available data, the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC and therefore limitations are not necessary at this time.

Total Recoverable Molybdenum- The newest standards for stream segment COSJPI06a

(Reg. 34, effective in March 2013) include a 30 day average requirement for total recoverable molybdenum. There were limited data for this parameter, but because all of the values were  $<5 \mu\text{g/l}$ , which is significantly lower than the potential limit of  $160 \mu\text{g/l}$ , a qualitative determination of no RP has been given, resulting in no limit nor monitoring requirement.

Total Mercury- Although there were effluent data available for total mercury, the detection level achieved of  $0.2 \mu\text{g/l}$  was greater than the calculated WQBEL ( $0.01 \mu\text{g/l}$ ) for this pollutant and were also much greater than the achievable detection levels. Consequently, the data are not considered adequate for use in quantitatively determining that there is no RP. Thus, a report only requirement, with the use of the **low level detection limit**, has been added to the permit, effective immediately.

Potentially Dissolved Nickel- The RP analysis for potentially dissolved nickel was based upon the WQBEL as calculated in the WQA. With the available data, the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC and therefore limitations are not necessary at this time.

Potentially Dissolved Selenium- The RP analysis for potentially dissolved selenium was based upon the WQBEL as described in the WQA. With the available data, the MDLWIN program was used to determine the appropriate statistics to determine the MEPC. Although the quantitative RP results in a limit, in looking at the data, no values exceed the potential limit of  $4.6 \mu\text{g/l}$ , and were less than  $3 \mu\text{g/l}$ . Thus a monitor only requirement is given for this parameter.

Potentially Dissolved Silver- The RP analysis for potentially dissolved silver was based upon the WQBEL as described in the WQA. With the available data, the MDLWIN program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC and therefore limitations are not necessary at this time.

Potentially Dissolved Zinc- The RP analysis for potentially dissolved zinc was based upon the WQBEL as described in the WQA. With the available data, the log-normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than the MAPC and therefore limitations are not necessary at this time, however the MEPC was greater than 50% of the MAPC and therefore monitoring is required for a 30 day average and a daily maximum. A report only requirement has been added to the permit, effective immediately.

Temperature- Based on the information presented in the WQA, this facility is exempt from the temperature requirements because the discharge is to a zero low flow stream.

Organics – The effluent is not expected or known to contain organic chemicals, and therefore, limitations for organic chemicals are not needed in this permit. However, for nonylphenol, a monitoring requirement will be required in the permit because it is known this organic parameter can commonly occur in domestic wastewater treatment facility effluent.

Whole Effluent Toxicity (WET) Testing – Vista WWTP is a major domestic wastewater treatment facility, and does have the potential for additional parameters to be present in the effluent that are not adequately controlled by chemical specific effluent limits. According to Division policy, sublethal WET testing will be required based on facility type and potential exceedances for metals and other toxics. Because the sublethal limit is more stringent than the previous permit limit, there will be a delayed effective date for this parameter. There will be a report only requirement until 12/31/2015, and beginning on 01/01/2016, the new permit limit will be effective.

1. In-Stream Waste Concentration (IWC) – Where monitoring or limitations for WET are deemed appropriate by the Division, the chronic in-stream dilution is critical in determining whether acute or chronic conditions shall apply. In accordance with Division policy, for those discharges where the chronic IWC is greater than 9.1% and the receiving stream has a Class 1 Aquatic Life use or Class 2 Aquatic Life use with all of the appropriate aquatic life numeric standards, chronic conditions will normally apply. Where the chronic IWC is less than or equal to 9.1, or the stream is not classified as described above, acute conditions will normally apply. The chronic IWC is determined using the following equation:

$$\text{IWC} = [\text{Facility Flow (FF)} / (\text{Stream Chronic Low Flow (annual)} + \text{FF})] \times 100\%$$

The flows and corresponding IWC for the appropriate discharge point are:

Permitted Feature	Chronic Low Flow, 30E3 (cfs)	Facility Design Flow (cfs)	IWC, (%)
001A	0	6	100

The IWC for this permit is 100 %, which represents a wastewater concentration of 100 % effluent to Stevens Draw, the receiving stream.

2. General Information – The permittee should read the WET testing section of Part I of the permit carefully, as this information has been updated in accordance with the Division's updated policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010) . The permit outlines the test requirements and the required follow-up actions the permittee must take to resolve a toxicity incident. The permittee should also read the above mentioned policy which is available on the Permit Section website. The permittee should be aware that some of the conditions outlined above may be subject to change if the facility experiences a change in discharge, as outlined in Part II.A.2. of the permit. Such changes shall be reported to the Division immediately.

C. Parameter Speciation

Total / Total Recoverable Metals

For standards based upon the total and total recoverable methods of analysis, the limitations are based upon the same method as the standard.

**Total / Total Recoverable Arsenic:**

For total recoverable arsenic, the analysis may be performed using a graphite furnace, however, this method may produce erroneous results and may not be available to the permittee. Therefore, the total method of analysis will be specified instead of the total recoverable method.

**Total Mercury:**

Until recently there has not been an effective method for monitoring low-level total mercury concentrations in either the receiving stream or the facility effluent. Monitoring for total mercury has been accomplished as part of past permit conditions and analytical results have all been found at less than detectable levels. However, detection levels only as low as 0.2 ug/l have been achieved, versus a total mercury detection limit of 0.003 ug/l. To ensure that adequate data are gathered to show compliance with the limitation and consistent with Division initiatives for mercury, quarterly effluent monitoring for total mercury at **low-level detection methods** will be required by the permit.

**Dissolved Metals / Potentially Dissolved:**

For metals with aquatic life-based dissolved standards, effluent limits and monitoring requirements are typically based upon the potentially dissolved method of analysis, as required under Regulation 31, Basic Standards and Methodologies for Surface Water. Thus, effluent limits and/or monitoring requirements for these metals will be prescribed as the “potentially dissolved” form.

**Hexavalent Chromium:**

For hexavalent chromium, samples must be unacidified. Accordingly, dissolved concentrations will be measured rather than potentially dissolved concentrations.

## **VII. ADDITIONAL TERMS AND CONDITIONS**

### **A. Monitoring**

Effluent Monitoring – Effluent monitoring will be required as shown in the permit document. Refer to the permit for locations of monitoring points. Monitoring requirements have been established in accordance with the frequencies and sample types set forth in the Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Industrial and Domestic Wastewater Treatment Facilities. This policy includes the methods for reduced monitoring frequencies based upon facility compliance as well as for considerations given in exchange for instream monitoring programs initiated by the permittee. Table VI-2 shows the results of the reduced monitoring frequency analysis for Permitted Feature 001A, based upon compliance with the previous permit.

Based upon the reduced monitoring frequency analysis for Permitted Feature 001A, shown in Table VI-2, the permittee is not eligible for reduced monitoring for pH, *E. coli*, potentially dissolved copper, and total recoverable iron.

The quarterly monitoring frequency for mercury is imposed consistent with the Divisions’ recent initiative to include quarterly monitoring for mercury because of the changes in analytical procedure that will allow total mercury to be quantified at much lower concentrations.

**Table VI-2 – Monitoring Reduction Evaluation**

<i>Parameter</i>	<i>Proposed Permit Limit</i>	<i>Average of 30-Day (or Daily Max) Average Conc.</i>	<i>Standard Deviation</i>	<i>Long Term Characterization (LTC)</i>	<i>Reduction Potential</i>
<i>pH (su) Minimum</i>	<i>min 6.5</i>	<i>6.9</i>	<i>0.41</i>	<i>6.08</i>	<i>None</i>
<i>pH (su) Maximum</i>	<i>max 9.0</i>	<i>7.8</i>	<i>0.41</i>	<i>8.62</i>	
<i>Fecal Coliform (#/100 ml)</i>	<i>325</i>	<i>10</i>	<i>77</i>	<i>164</i>	<i>2 Levels</i>
<i>E. coli (#/100 ml)</i>	<i>205</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>
<i>NH3 as N, Tot (mg/l)</i>	<i>3</i>	<i>3.5</i>	<i>0.82</i>	<i>5.14</i>	<i>None</i>
<i>BOD5, effluent (mg/l)</i>	<i>30</i>	<i>5.4</i>	<i>1.7</i>	<i>8.8</i>	<i>3 Levels</i>
<i>TSS, effluent (mg/l)</i>	<i>30</i>	<i>6</i>	<i>3</i>	<i>12</i>	<i>3 Levels</i>
<i>Oil and Grease (mg/l)</i>	<i>10</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>3 Levels</i>
<i>Cu, Dis (µg/l)</i>	<i>29</i>	<i>13</i>	<i>9.8</i>	<i>32.6</i>	<i>None</i>
<i>Fe, TR (µg/l)</i>	<i>1000</i>	<i>69</i>	<i>27</i>	<i>123</i>	<i>3 Levels</i>
<i>Hg, Tot (µg/l)</i>	<i>0.01</i>	<i>0.2</i>	<i>0</i>	<i>0.2</i>	<i>None</i>
<i>Se, Dis (µg/l)</i>	<i>4.6</i>	<i>1.3</i>	<i>0.47</i>	<i>2.24</i>	<i>3 Levels</i>
<i>Zn, Dis (µg/l)</i>	<i>405</i>	<i>83</i>	<i>77</i>	<i>237</i>	<i>2 Levels</i>

## **B. Reporting**

1. Discharge Monitoring Report – The Pagosa Area Water and Sanitation District facility must submit Discharge Monitoring Reports (DMRs) on a monthly basis to the Division. These reports should contain the required summarization of the test results for all parameters and monitoring frequencies shown in Part I.B of the permit. See the permit, Part I.B, C, D and/or E for details on such submission.
2. Special Reports – Special reports are required in the event of an upset, bypass, or other noncompliance. Please refer to Part II.A of the permit for reporting requirements. As above, submittal of these reports to the US Environmental Protection Agency Region VIII is no longer required.

## **C. Signatory and Certification Requirements**

Signatory and certification requirements for reports and submittals are discussed in Part I.E.6 of the permit.

## **D. Compliance Schedules**

The following compliance schedules are included in the permit. See Part I.B of the permit for more information.

E. coli- Because no data exists for this parameter, the permittee is given a year to collect the necessary data to determine whether the limitation can be met and to submit a progress report to the Division. After the progress report is submitted, the permittee is given an additional 6 months to show compliance with the new limit.

Potentially Dissolved Copper- Because sources of copper to the WWTP need to be

identified and equipment may need to be installed, the permittee is given 3 years after the effective date of the permit to be in compliance with this parameter.

All information and written reports required by the following compliance schedules should be directed to the Permits Section for final review unless otherwise stated.

#### **E. Stormwater**

Pursuant to 5 CCR 1002-61.3(2), wastewater treatment facilities with a design flow of 1.0 MGD or more, or that are required to have an approved pretreatment program, are specifically required to obtain stormwater discharge permit coverage, or a Stormwater No Exposure Certification, in order to discharge stormwater from their facilities to state waters. The stormwater discharge permit applicable to wastewater treatment facilities is the CDPS General Permit for Stormwater Discharges Associated with Non-Extractive Industrial Activity.

Division records indicate that this facility is covered under a No Exposure Certification NOX000174.

#### **F. Economic Reasonableness Evaluation**

Section 25-8-503(8) of the revised (June 1985) Colorado Water Quality Control Act required the Division to "determine whether or not any or all of the water quality standard based effluent limitations are reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons, and are in furtherance of the policies set forth in sections 25-8-192 and 25-8-104."

The Colorado Discharge Permit System Regulations, Regulation No. 61, further define this requirement under 61.11 and state: "Where economic, environmental, public health and energy impacts to the public and affected persons have been considered in the classifications and standards setting process, permits written to meet the standards may be presumed to have taken into consideration economic factors unless:

- a. A new permit is issued where the discharge was not in existence at the time of the classification and standards rulemaking, or
- b. In the case of a continuing discharge, additional information or factors have emerged that were not anticipated or considered at the time of the classification and standards rulemaking."

The evaluation for this permit shows that the Water Quality Control Commission, during their proceedings to adopt the Classifications and Numeric Standards for San Juan River and Dolores River Basins, considered economic reasonableness.

Furthermore, this is not a new discharger and no new information has been presented regarding the classifications and standards. Therefore, the water quality standard-based effluent limitations of this permit are determined to be reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons and are in furtherance of the policies set forth in Sections 25-8-102 and 104. If



the permittee disagrees with this finding, pursuant to 61.11(b)(ii) of the Colorado Discharge Permit System Regulations, the permittee should submit all pertinent information to the Division during the public notice period.

**Drafter Jo Anna Beck**  
**Date 10/15/12**

## **VIII. REFERENCES**

- A. Colorado Department of Public Health and Environment, Water Quality Control Division Files, for Permit Number CO0031755.
- B. “Design Criteria Considered in the Review of Wastewater Treatment Facilities”, Policy 96-1, Colorado Department of Public Health and Environment, Water Quality Control Commission, April 2007.
- C. Basic Standards and Methodologies for Surface Water, Regulation No. 31, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2012.
- D. Classifications and Numeric Standards for San Juan River and Dolores River Basins, Regulation No. 34, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 1, 2013.
- E. Colorado Discharge Permit System Regulations, Regulation No. 61, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 1, 2012.
- F. Regulations for Effluent Limitations, Regulation No. 62, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective July 30, 2012.
- G. Pretreatment Regulations, Regulation No. 63, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 01, 2007.
- H. Biosolids Regulation, Regulation No. 64, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2010.
- I. Colorado River Salinity Standards, Regulation No. 39, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective August 30, 1997.
- J. Section 303(d) List of Water Quality Limited Segments Requiring TMDLs, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2012.
- K. Colorado’s Section 303(d) List of Impaired Waters and Monitoring and Evaluation List, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 30, 2010.

- L. Antidegradation Significance Determination for New or Increased Water Quality Impacts, Procedural Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2001.
- M. Memorandum Re: First Update to (Antidegradation) Guidance Version 1.0, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 23, 2002.
- N. Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2002.
- O. The Colorado Mixing Zone Implementation Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 2002.
- P. Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Domestic and Industrial Wastewater Treatment Facilities, Water Quality Control Division Policy WQP-20, May 1, 2007.
- Q. Implementing Narrative Standards in Discharge Permits for the Protection of Irrigated Crops, Water Quality Control Division Policy WQP-24, March 10, 2008.
- R. Implementing Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (WET) Testing, Colorado Department of Public Health and Environment, Water Quality Control Division Policy Permits-1, September 30, 2010.
- S. Policy for Conducting Assessments for Implementation of Temperature Standards in Discharge Permits, Colorado Department of Public Health and Environment, Water Quality Control Division, Policy Number WQP-23, effective July 3, 2008.
- T. Policy for Permit Compliance Schedules, Colorado Department Public Health and Environment, Water Quality Control Division Policy Number WQP-30, effective December 2, 2010.
- U. Procedural Regulations for Site Applications for Domestic Wastewater Treatment Works, Regulation No. 22, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2009.
- V. Regulation Controlling discharges to Storm Sewers, Regulation No. 65, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective May 30, 2008.
- W. Water and Wastewater Facility Operator Certification Requirements, Regulation No. 100, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2007.

**a. PUBLIC NOTICE COMMENTS**

The public notice period was from 10/19/2012 to 11/19/2012. Comments were received from

the staff at Vista Wastewater Treatment Plant. These comments and the response of the Division are given below.

Comment #1:

The statement on page 5 of the Colorado Discharge Permit System Fact Sheet for Permit Number CO0031755 Pagosa Area Water and Sanitation District Vista Wastewater Treatment Plant, Archuleta County "The Division acquired laboratory results from these days and found an error took place in the translation from the laboratory results to the DMR data." PAWSD staff believes this is a misstatement as our records indicate the laboratory results and the DMR data are identical. Perhaps, the Water Quality Control Division (Division) records are incorrect.

Response #1:

After reviewing the hard copy DMR data sent from the WWTP for the months in question, the WWTP is correct. The hard copy records sent to the Division and the laboratory results do match, even though the DMR data acquired through ICIS was different. Therefore, the Division has fixed the errors in ICIS (EPA database), and also in the Fact Sheet and the Permit.

Previously, an extremely high value for cyanide was deleted as it was thought to be a DMR mistake. Upon further review, this value did appear on the DMR although it is believed to be an error it was added back into the dataset. There is no change in the RP determination for cyanide.

Comment #2:

The statement on page 15 of the Colorado Discharge Permit System Fact Sheet for Permit Number CO0031755 Pagosa Area Water and Sanitation District Vista Wastewater Treatment Plant, Archuleta County "The Division therefore requested laboratory results for this particular month, and found an error occurred in the process of translating the results from the laboratory document to the DMR." PAWSD again believes may be a misstatement as our records indicate the laboratory results and the DMR data are identical. Perhaps, the records the Division has are once again incorrect.

Response #2:

The Division has the same response for comment #2 as comment #1.

Comment #3:

Lastly, the increased monitoring requirements for fecal coliform, *E. coli*, ammonia, BOD5, TSS (both influent and effluent), and Cu will increase monitoring costs for PAWSD three-fold and necessitate staff increases. It is PAWSD's position these increases are not necessary to protect the waters of the state as PAWSD has not had any challenges with these parameters and our facility averages are far below capacity at 0.6 MGD per day. PAWSD is also committed to improving our ammonia levels as we begin to monitor for and address any perceived issues with nutrient levels in the coming months.

Response #3:

Because the design flow capacity for Vista WWTP is in the range of 1-5 MGD, the Division required monitoring 3 times/week for fecal coliform, *E. coli*, ammonia, BOD5, TSS and 2 times/month for Cu. However, because the actual flow of the plant is <1 MGD, and is not expected to increase over 1 MGD, the Division will base the monitoring frequencies off of the lower flow tier and then further reduce the frequencies based on the reduced monitoring evaluation. BOD, TSS and metals (except copper) have been reduced to quarterly, copper to

monthly, and all other parameters to weekly.